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8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 APPROXIMATELY \$24,000.00 IN  
U.S. CURRENCY,  
15 Defendant.  
16

2:21-MC-00041-WBS-KJN

STIPULATION AND ORDER EXTENDING TIME  
FOR FILING A COMPLAINT FOR FORFEITURE  
AND/OR TO OBTAIN AN INDICTMENT  
ALLEGING FORFEITURE

17 It is hereby stipulated by and between the United States of America and potential claimant  
18 Bradley Hoderny (“claimant”), by and through their respective counsel, as follows:

19 1. On or about November 23, 2020, claimant filed a claim in the administrative forfeiture  
20 proceeding with the United States Postal Inspection Service (“USPIS”) with respect to the Approximately  
21 \$24,000.00 in U.S. Currency (hereafter “defendant currency”), which was seized on September 1, 2020.

22 2. The USPIS has sent the written notice of intent to forfeit required by 18 U.S.C. §  
23 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the  
24 defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a  
25 claim to the defendant currency as required by law in the administrative forfeiture proceeding.

26 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for  
27 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant  
28 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative

1 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the  
2 parties. That deadline is February 19, 2021.

3 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to April  
4 20, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the  
5 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
6 forfeiture.

7 5. Accordingly, the parties agree that the deadline by which the United States shall be  
8 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment  
9 alleging that the defendant currency is subject to forfeiture shall be extended to April 20, 2021.

10  
11 Dated: 02/16/21

McGREGOR W. SCOTT  
United States Attorney

12  
13 By: /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant United States Attorney

14  
15  
16 Dated: 02/12/21

/s/ Isaac Safier  
ISAAC SAFIER  
Attorney for potential claimant  
Bradley Hoderny  
(Signature authorized by email)

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20  
21 **IT IS SO ORDERED.**

22 Dated: February 16, 2021



WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE